

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

CONSTANTINESCU, *et al.*

Defendants.

§
§
§
§
§
§
§

Case No. 4:22-cr-612

The Honorable Andrew S. Hanen

United States' Motion for Extension of Time to Response to Motions *in Limine*

The United States, by and through undersigned counsel, respectfully moves for an extension of time in which to file responses to motions *in limine*, until February 27, 2024. Defendants Hrvatin, Rybarczyk, Deel, Cooperman, and Constantinescu are unopposed.

The operative Scheduling Order required motions *in limine* to be filed by February 9, 2024. (ECF No. 415.) The Order set February 20, 2024, as the due date for Responses to motions *in limine*. (ECF No. 415.) In the interim, the Court also set a hearing for February 20, 2024. (ECF No. 528.)

Defendants have filed a flurry of motions *in limine*. In order to be more helpful to the Court in ruling on the motions, the United States respectfully requests that the Court extend the deadline by which parties must respond to motions *in limine* by one week, to February 27, 2024. The Order does not contemplate reply briefing, so that date would still give the Court three weeks to review the parties' submissions before the March 19, 2024 pre-trial conference. The additional time is not sought in the interest of delay but is instead requested so that the United States may adequately address the numerous issues raised by Defendants.

Thus, the United States respectfully requests that the Court extend the motions *in limine* response deadline for all parties by one-week, to February 27, 2024.

Dated: February 13, 2023

Respectfully submitted,

GLENN S. LEON
Chief, Fraud Section
Criminal Division, Department of Justice

By: /s/ John J. Liolos
Scott Armstrong, Assistant Chief
John J. Liolos, Trial Attorney
Fraud Section, Criminal Division
United States Department of Justice
1400 New York Ave. NW
Washington, DC 20005
Tel.: (202) 768-2246

ALAMDAR S. HAMDANI
United States Attorney
Southern District of Texas

By: /s/ Thomas Carter
Thomas H. Carter
Assistant United States Attorney
State Bar No.: TX24048387
1000 Louisiana Street, 25th Floor
Houston, Texas 77002
Tel.: (713) 567-9470

CERTIFICATE OF CONFERENCE

I hereby certify that on February 12, 2024, the United States proposed the one-week deadline extension to counsel for Defendants. Counsel for Defendants Hrvatin, Rybarczyk, Deel, Cooperman, and Constantinescu indicated they do not object to the proposed extension. Counsel for the remaining Defendants did not state their positions on the request.

/s/ John J. Liolos

John J. Liolos, Trial Attorney

U.S. Department of Justice

Criminal Division, Fraud Section

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2024, I will cause the foregoing motion to be electronically filed with the Clerk of the Court using the CM/ECF. system, which will provide copies to counsel for all parties.

/s/ John J. Liolos

John J. Liolos, Trial Attorney

U.S. Department of Justice

Criminal Division, Fraud Section